

Debtor 1 Joann E. Sausman aka Jo Anne E. Sausman

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: EASTERN District of Pennsylvania  
(State)

Case number 16-10260-elf

## Form 4100R

# Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

**Name of creditor:** LSF9 Master Participation Trust

**Court claim no. (if known):** 4-1

**Last 4 digits** of any number you use to identify the debtor's account: 7 2 2 5

**Property address:** 821 Ridley Creek Drive  
Number Street

Media, Pennsylvania 19063  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

### Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:      /      /       
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 7,371.84
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ 1,450.00
- c. **Total.** Add lines a and b. (c) \$ 8,821.84

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: 9 / 26 / 2020  
MM / DD / YYYY

Debtor 1 Joann E. Sausman aka Jo Anne E. Sausman Case number (if known) 16-10260-elf  
First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Lauren M. Moyer, Esquire  
Signature

Date 03 / 19 / 2021

Print Lauren M. Moyer  
First Name Middle Name Last Name

Title Attorney for creditor

Company McCabe, Weisberg & Conway, LLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 123 S. Broad Street, Suite 1400  
Number Street

Philadelphia, PA 19109  
City State ZIP Code

Contact phone (215) 790 - 1010

Email ecfmil@mwc-law.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Joann E. Sausman aka Jo Anne E.  
Sausman

Chapter 13  
Bankruptcy No. 16-10260-elf

Debtor(s)

LSF9 Master Participation Trust, or its  
Successor or Assignee

Movant

vs.

WILLIAM C. MILLER, Esq., Trustee  
Joann E. Sausman aka Jo Anne E. Sausman  
Respondent(s)

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE  
PAYMENT**

I, Lauren M. Moyer, attorney for LSF9 Master Participation Trust, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: March 19, 2021

Joann E. Sausman aka Jo  
Anne E. Sausman  
821 Ridley Creek Drive  
Media, PA 19063

Robert H. Holber  
Attorney Robert H. Holber  
PC  
41 East Front Street  
Media, PA 19063  
Attorney for Debtor

WILLIAM C. MILLER, Esq.  
Chapter 13 Trustee  
P.O. Box 1229  
Philadelphia, PA 19105  
Trustee

U.S. Trustee  
Office of the United States Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106

/s/ Lauren M. Moyer

LAUREN M. MOYER, ESQUIRE ID # 320589

JOHN M. KOLESNIK, ESQUIRE ID # 308877

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